

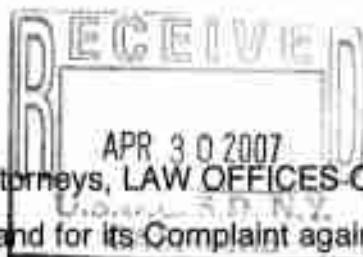
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK07 CV 3399
X
MAERSK LINE,

- against -

Plaintiff
JUDGE KOELTL
CIVIL COMPLAINT
IN ADMIRALTYANDERSON INTERNATIONAL
GLOBAL, LLC, a/k/a WORLDWIDE
PAPER CO.,

Defendant.

X



Plaintiff MAERSK LINE, by its attorneys, LAW OFFICES OF ALBERT J. AVALLONE & ASSOCIATES, as and for its Complaint against defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO., in personam, in a cause of action civil and maritime, alleges upon information and belief:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure, the Ocean Shipping Reform Act of 1999, 46 U.S.C., App. Section 1701, et seq., and Paragraph 14.4 of the Bills of Lading.
2. At all times hereinafter mentioned, plaintiff MAERSK LINE was and still is a corporation duly organized and existing under the laws of the State of Delaware with offices and a place of business at 6000 Carnegie Blvd., Charlotte, NC 28209.
3. Upon information and belief and at all times hereinafter mentioned, defendant had and now has the legal status and place of business as set forth in Schedule A.
4. On or about the dates and at the ports of shipment stated in Schedule A, certain goods were delivered to plaintiff to be carried to the ports of destination and at the agreed charges to be paid by defendant pursuant to plaintiff's published tariff, all as set forth in Schedule A.
5. Thereafter, the goods were carried to the ports of destination and

delivered to the consignee and/or its agents.

6. Plaintiff has performed all duties and obligations required to be performed by plaintiff.

7. Defendant has failed and refused and continues to fail and refuse to remit payment of \$13,122.00, although duly demanded.

8. By reason of the foregoing, plaintiff has sustained damages in the amount of \$13,122.00 which, although duly demanded, have not been paid.

WHEREFORE, plaintiff prays:

1. For judgment in the amount of plaintiff's damages, together with interest thereon, costs, disbursements and a reasonable attorney's fee.

2. That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction may issue against the defendants citing them to appear and answer all the singular matters aforesaid.

3. That plaintiff have such other and further relief in the premises as in law and justice it may be entitled to receive.

Dated: New York, New York
April 30, 2007

LAW OFFICES OF
ALBERT J. AVALLONE & ASSOCIATES

By _____


Albert J. Avallone - AA1679
Attorneys for Plaintiff
MAERSK LINE
551 Fifth Avenue, Suite 1625
New York, NY 10176
(212) 696-1760

I. Defendant's status & address:

A. Upon information and belief and at all times hereinafter mentioned.

defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO. was and still is a corporation organized and existing under the laws of the State of Illinois, with offices and a place of business at 60-B West Terra Cotta Ave. #234, Crystal Lake, IL 60014, with an agent for service of process at Law Offices of Andrew Sagartz, 1880 W. Winchester Road, Suite 206, Libertyville, IL 60048.

II. Details of shipment(s):

1. Bill of Lading No. MAEUTOR203329, dated May 16, 2005, from Long Beach to Haiphong via Los Angeles on the Vessel CARSTEN MAERSK, seven (7) forty-foot Hi-Cubes SAID TO CONTAIN: WHITE TISSUE BALES, at the applicable tariff charge of \$5,317.00 (Exhibit A).

Amount Due: \$5,317.00

2. Bill of Lading No. MAEUTORDA0280, dated September 12, 2005.

from Oakland to Nhava Sheva on the Vessel **SL LIGHTENING**, five (5) forty-foot Hi-Cubes **SAID TO CONTAIN: WASTE PAPER**, at the applicable tariff charge of \$7,805.00 (Exhibit B).

III. Total Amount Due: \$13,122.00

TC
TRANSPORT BY CONTAINER VESSEL,
ON BOARD CARSTEN MAERSK V.306
EX LOS ANGELES, CA, USA ON 15
MAY 2005
S/N: X20050511037005
POINT OF ORIGIN: USA CT
* USA
** VIETNAM

